USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 8/14/17

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - - - - - - - - - - - - - - - x

UNITED STATES OF AMERICA :

- v. - :

MARQUIS WRIGHT, :

Defendant. :

:

- - - - - - - - - - - - - - - - - - - x

SUPERSEDING INFORMATION

S13 15 Cr. 445 (PAE)

COUNT ONE
(Use of a Firearm in Connection with Murder in Aid of Racketeering)

The United States Attorney charges:

1. On or about May 29, 2011, in the Southern District of New York, MARQUIS WRIGHT, the defendant, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, namely, the murder of Johnny Moore in the vicinity of 2625 Third Avenue, Bronx, New York, which murder was committed for the purpose of gaining entrance to and maintaining and increasing WRIGHT's position in "18 Park," an enterprise engaged in racketeering activity, in violation of Title 18, United States Code, Section 1959(a)(1), knowingly did use and carry a firearm, and, in furtherance of such crime, did possess

a firearm, which firearm was discharged, and did aid and abet the same.

(Title 18, United States Code, Sections 924(c)(1)(A)(iii) and 2.)

COUNT TWO

(Use of Firearms in Connection with Racketeering and Narcotics Conspiracies)

The United States Attorney further charges:

2. From at least in or about 2006 up to and including in or about December 2015, and on occasions other than on or about May 29, 2011, as charged in Count One, in the Southern District of New York and elsewhere, MARQUIS WRIGHT, the defendant, during and in relation to (a) crime of violence for which he may be prosecuted in a court of the United States, namely, his participation in "18 Park," an enterprise engaged in racketeering activity, including murder and attempted murder, in violation of Title 18, United States Code, Section 1962(c), and (b) a drug trafficking crime for which he may be prosecuted in a court of the United States, namely, a conspiracy to distribute and possess with the intent to distribute heroin, cocaine base, cocaine, and marijuana, knowingly did use and carry firearms, and, in furtherance of such crimes,

did possess firearms, some of which firearms were brandished and discharged on multiple occasions, and did aid and abet the same.

(Title 18, United States Code, Sections 924(c)(1)(A)(i), (ii), and (iii), 924(c)(1)(C)(i), and 2.)

JOON H. KIM MS
Acting United States Attorney

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

MARQUIS WRIGHT,

Defendant.

SUPERSEDING INFORMATION

S12 15 Cr. 445 (PAE)

(18 U.S.C. §§ 924(c) and 2.)

JOON H. KIM

Acting United States Attorney.